

TO: FCC, Wireline Competition Bureau  
FROM: Dennis D. Lundgren  
DATE: May 1, 2007

CC Docket No. 02-6

These comments are in regard to the E-Rate rules concerning technology plan creation and approval under the schools and libraries universal service support mechanism.

I support the requirement that technology plans for the funding year be approved prior to the commencement of services. It is clear that this is a longstanding requirement of the program.

As an E-Rate contact for a consortium of 22 school entities, I find the current practice that requires technology plans to be created before filing 470s to be impractical and unreasonable. In Michigan, our schools have a July 1 approval deadline which requires the submission of plan for review in the early spring. At the same time, most schools have technology plan in place until July 1.

I would suggest the following interpretation for technology planning guidelines that I believe will better meet the intent and letter of the FCC rules:

1. Any school or library applicant operating under an approved technology plan at the time it files a Form 470 would be deemed compliant with the FCC's pre-bidding planning rules for the forthcoming funding year.
2. Should an applicant plan to introduce a new technology initiative not covered in its existing plan, upon request, be responsible for demonstrating that it was following the evaluation component of its current plan. An approved new or revised plan should not be required.
3. A consortium should be permitted to rely upon the technology status of each of its members when the consortium files a Form 470. USAC procedures should be limited to a review of the consortium members Letters of Agencies ("LOAs") if such LOAs contain appropriate certification on technology plan status.

I urge the FCC to clarify its pre-Form470 technology plan requirements as presented above.

Sincerely yours,

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